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November 27, 2017

Magistrate Judge Steven I. Locke
100 Federal Plaza
Central Islip, NY 11722

Re: Defeo v. Leibstien, et. al, 16 Civ. 5150 (SJF) (SIL)

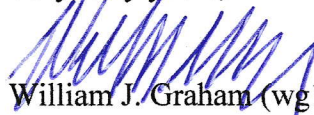
Dear Magistrate Locke:

I represent Defendants Guy Leibstien and B & E Printing, Inc., doing business as Adcomm in the above matter, and I write to request an extension of time to identify case in chief experts. The deadline set out in the scheduling order is December 1, 2017. Currently, our next court appearance is scheduled for December 7, 2017 at 11 a.m. for argument on a motion for a protective order filed by County of Suffolk.

The reason why I'm requesting an extension is that I need more information about plaintiff's factual contentions to determine whether expert testimony is necessary. At the current time, depositions are scheduled to be completed by January 12, 2018. Secondly, my client is a small business, and I would rather engage in a settlement conference than expend thousands of dollars of my clients' money on an expert witness that could be better used to settle the case.

Thank you for your consideration of this application.

Very truly yours,



William J. Graham (wg1421)

Cc: Ryan Lozar, PC